

CAAAG

Air Permit Program


Emerging Issues

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Goals of Session

- Provide Information – What's New in Permitting
 - NSR Reform Update
 - Solicit Topics for Environmental Conference
 - Solicit Advice – Where Can We Improve
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What's New In Permitting

- Re-organized Units
- MACT Standards
- Expedited Approvals
- Title V Renewals
- When Am I Going to Get My Permit?

3 Air Permitting Units (1/3)

Ralph Walden, Supervisor

Dana Morris

Amer Safadi

- Refineries
- Grain Processing
- Foundries
- Dispersion Modeling

3 Air Permitting Units (2/3)

Mindy Bowman, Supervisor

Rick Bolfig

Bert Buckland

Jennifer Burgdorfer

John Ramsey

- Ethanol
- Coal Fired Power Plants
- Portland Cement
- Landfills
- Mineral Products Industry

3 Air Permitting Units (3/3)

David Peter, Supervisor

Rasha Allen

Mike Parhomek

Jim Stewart

Brad Wood

- Chemical Plants
- Natural Gas Industry
- Aerospace Industry
- Municipal Power Plants
- Other VOC Sources

MACTs

- Newly promulgated MACTs (None)
- Upcoming initial compliance dates
 - Asphalt Processing, MACT LLLLLL – 5/01/06
 - **Brick and Structural Clay, MACT JJJJJ – 5/16/06**
 - Clay Ceramics, MACT KKKKK – 5/16/06
 - **Engine Test Cells, MACT PPPPP – 5/27/06**
 - **Fabric Printing, Coating & Dyeing, MACT OOOO – 5/29/06**
 - Integrated Iron & Steel, MACT FFFFF – 5/20/06
 - **Metal Furniture Surface Coating, MACT RRRR – 5/23/06**
 - Semiconductor Mfg, MACT BBBBB – 5/22/06
 - Wood Building Products, MACT QQQQ – 5/28/06

Expedited Approvals

- Applicable Emission Units
 - Emergency Generators
 - Compressor Engines with Total HP < 240
 - Temporary Diesel Engines
- Approvals Issued Since July 2005
 - 151 Emergency Generators (mostly existing)
 - 25 Compressor Engines
 - 1 Temporary Diesel Engine

Title V Renewals (1/2)

- New abbreviated applications for renewals
- Soliciting comments on new applications
- Remember to include CAM for units:
 - That are major
 - Subject to an emission limit
 - Using control equipment to meet emission limit

Title V Renewals (2/2)

- We are sending out renewal reminders
- Content of Renewal Permits
 - Facility wide monitoring requirements
 - Insignificant activities not listed in permit (except those with applicable requirements)

When Am I Going to Get My Permit?

It Depends

- PSD vs. Permit vs. Approval
- Public Notice
- Operating vs. Construction

Construction Permits Issued

TYPE OF PERMIT	ANNUAL AVERAGE (1/97 – 4/05)	LAST YEAR (4/05 – 4/06)
PSD	2	4
Permit – Public Notice	35	13
Permit – No Public Notice	28	96
Approval – No Public Notice	129	157
Response Letter	226	120
TOTAL	420	390

Average Days to Issue Permit

TYPE OF PERMIT	AVERAGE FROM 1/97 – 4/05 (Days)	AVERAGE FROM 4/05 – 4/06 (Days)
PSD	282	229
Permit – Public Notice	113	96
Permit – No Public Notice	49	42
Approval – No Public Notice	46	26
Response Letter	39	22

Median Days to Issue Permit

TYPE OF PERMIT	MEDIAN FROM 1/97 – 4/05 (Days)	MEDIAN FROM 4/05 – 4/06 (Days)
PSD	207	294
Permit – Public Notice	88	74
Permit – No Public Notice	29	32
Approval – No Public Notice	28	20
Response Letter	25	17

Applications By Industry Type

INDUSTRY TYPE	ANNUAL AVERAGE (1/97 – 4/05)	LAST YEAR (4/05 – 4/06)
Natural Gas (SIC – 1311, 4922)	103	119
Rock Crushers (SIC – 1422)	34	38
Ethanol (SIC – 2869)	2	15
Refineries (SIC – 2911)	15	17
Aerospace (SIC – 3721, 3724)	11	14
Electric Services (SIC – 4911)	11	8
TOTAL	425	387

PSD Permit Applications

- From April 21, 1997 through October 8, 2005, KDHE & WYCO received an average of 2 per year.
- From October 8, 2005 through April 21, 2006, KDHE & WYCO received 6.

Construction Permit Backlog

As of...	Applications in Backlog
July 1, 2002	86
July 1, 2003	27
July 1, 2004	39
July 1, 2005	20
April 1, 2006	6

Operating Permit Backlog

As of...	Applications in Backlog
July 1, 2002	195
July 1, 2003	156
July 1, 2004	75
July 1, 2005	11
April 1, 2006	3*

*Only 1 "Initial" Title V Application Not Issued

When Am I Going to Get My Permit?

Bottom Line, Goal Timeframes Are

- 180 days for complex
- 30 days for routine




Other Topics of Interest (1/2)

- Collocated facilities may require single permit
 - Grain elevators / ethanol plants
 - Determination criteria
 - Contiguous or adjacent property
 - Common owner / common control
 - Same 2 digit SIC / support facilities
- RMRR vacated by DC Circuit Court

Other Topics of Interest (2/2)

- EPA Audit
 - More Dispersion Modeling
 - Replacement Units
- Flash Emissions Compliance Initiative
- Streamlined Permits for Ready Mixed Concrete

Topics for Environmental Conference

- NSR Reform
 - Construction Permit Reg. Changes (if any)
 - Routine Maintenance, Repair & Replacement Issues
 - Title V Modifications
 - Calculating PTE for Various Processes
 - Other Suggestions
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Where Would You Like to See Us Focus Resources?

- Finish proposed construction permit regulations
- Just issue permits faster
- Improve permit content
 - Simplify language
 - Clarify requirements
 - Other?
- Outreach/ Workshops
 - NSR Reform
 - MACT
 - Other topics?
- Technical guidance

Summary

- Permitting Update
 - Re-organized Units
 - MACT Standards
 - Expedited Approvals
 - Title V Renewals
 - Permit Timelines
- NSR Reform Update
- Environmental Conference
- Solicit Advice – Where Can We Improve

Questions/ Suggestions?

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- David Peter (785) 296-1104